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10 *Attorney for Plaintiff Deutsche Bank National Trust Company, As Trustee For Ameriquest*
11 *Mortgage Securities Inc., Asset-Backed Pass-Through Certificates, Series 2005-R3*

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 DEUTSCHE BANK NATIONAL TRUST
15 COMPANY, AS TRUSTEE FOR
16 AMERIQUEST MORTGAGE SECURITIES
17 INC., ASSET-BACKED PASS-THROUGH
18 CERTIFICATES, SERIES 2005-R3, a
19 Delaware Corporation,

20 Plaintiff,

21 vs.

22 FIDELITY NATIONAL TITLE GROUP,
23 INC. and CHICAGO TITLE INSURANCE
24 COMPANY,

25 Defendants.

Case No.: 2:19-cv-00220-RFB-CWH

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
FIDELITY’S MOTION TO DISMISS
[ECF NO. 6] AND CHICAGO’S MOTION
TO DISMISS [ECF NO. 7]**

[First Request]

26 Plaintiff, Deutsche Bank National Trust Company, As Trustee For Ameriquest Mortgage
27 Securities Inc., Asset-Backed Pass-Through Certificates, Series 2005-R3 (“Deutsche Bank”),
28 Defendant Fidelity National Title Group, Inc. (“Fidelity”), and Defendant Chicago Title
Insurance Company (“Chicago”), by and through their respective attorneys of records, hereby
agree and stipulate as follows.

1. On May 28, 2019, Fidelity filed a Motion to Dismiss for Lack of Personal
Jurisdiction; or in the Alternative, to Dismiss for Failure to State a Claim;
Memorandum of Points and Authorities [ECF No. 6];

- 1 2. On May 28, 2019, Chicago filed a Motion to Dismiss for Lack of Subject Matter
- 2 Jurisdiction; Memorandum of Points and Authorities [ECF No. 7];
- 3 3. Deutsche Bank's response to the Motions to Dismiss are currently due June 11, 2019;
- 4 4. Deutsche Bank's counsel is requesting an additional thirty (30) days to file its
- 5 responses to the Motions to Dismiss, and thus requests up to July 11, 2019, to file its
- 6 Oppositions;
- 7 5. This extension is requested to allow Counsel for Deutsche Bank additional time to
- 8 review and respond to the points and authorities cited to in the Motions;
- 9 6. Counsel for Fidelity and Chicago does not oppose this extension;
- 10 7. This is the first request for an extension which is made in good faith and not for
- 11 purposes of delay; and

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1 8. In addition, the Parties stipulate to stay discovery pending conclusion of briefing on
2 the Motions to Dismiss [ECF Nos. 6 and 7]; in other words, through the date that
3 Fidelity and Chicago each file a Reply in support of their respective Motion to
4 Dismiss. Thereafter, discovery shall automatically resume.

5 **IT IS SO STIPULATED.**

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7 DATED this 11th of June, 2019.

8 WRIGHT, FINLAY & ZAK, LLP

9 /s/ Christina V. Miller

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15 Las Vegas, NV 89117

16 *Attorneys for Plaintiff Deutsche Bank*

17 *National Trust Company, As Trustee For*

18 *Ameriquet Mortgage Securities Inc., Asset-*

19 *Backed Pass-Through Certificates, Series*

20 *2005-R3*

DATED this 11th of June, 2019.

EARLY SULLIVAN WRIGHT GIZER &
McRAE LLP

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Attorneys for Defendants, Fidelity National

Title Group, Inc. and Chicago Title

Insurance Company

21 **IT IS SO ORDERED.**

22 Dated this 12th day of June, 2019.

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RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE